

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

DEBRA SORENSEN,

Plaintiff,

vs.

COMPLAINT

FRATERNAL ORDER of the
EAGLES, LOCAL CHAPTER 200,

Defendant.

COMES NOW the Plaintiff, Debra Sorensen, and for her cause of action against the Defendant, alleges and states as follows:

1. The Plaintiff is, and at all times relevant to the actions complained of here has been, a resident of Fremont, Dodge County, Nebraska and presently resides at 1655 North C Street, in said city.

2. The Defendant, Fraternal Order of the Eagles, Local Chapter 200, is a non-profit domestic organization located in Nebraska doing business in Fremont, Dodge County, Nebraska.

3. Jurisdiction of this action is pursuant to Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act [29 USC Sec. 621-634], and the Americans with Disabilities Act of 1990 for damages based on the unlawful employment practices committed by Defendant is invoked pursuant to 28 USC Sec. 1331 and 1337, and 29 USC Sec. 216(b), 626(b) and (c).

4. At all times relevant to the actions complained of herein, the Defendant was an entity engaged in an industry affecting commerce employing 20 or more persons for each working day in 20 or more calendar weeks in the current or preceding year.

5. In August of 2008, the Plaintiff was hired by the Defendant and at all relevant times herein, the Plaintiff was an employee of the Defendant.

6. Throughout her employment with the Defendant, the Plaintiff met all applicable job qualifications, was qualified for the position for which she held, and performed the job in a manner which fully met the Defendant's expectations.

7. On December 19, 2009, the Plaintiff was discharged by the Defendant.

8. When discharged by the Defendant, the Plaintiff was 57 years of age, having been born November 12, 1952.

9. The Defendant refused to retain the Plaintiff because of her age and assigned her less profitable work shifts due to her age.

10. The Defendant treated employees not in the protested age group more favorably because of their age.

11. The Defendant allowed a person in a supervisory position to continually subject the Plaintiff to repeated episodes of offensive, embarrassing, and hostile comments.

12. The Plaintiff was discharged while employees not in the protected age group were retained and due to her complaint of sexual discrimination to the EEOC.

13. On or about June 17, 2011, the Plaintiff received a letter from the U.S. Equal Employment Opportunity Commission, providing Plaintiff with Notice of her Right to Sue.

14. The Defendant's violation of Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act [29 USC Sec. 621-634], and the Americans with Disabilities Act of 1990 was willful and the proximate cause of the Plaintiff's injuries and damages.

WHEREFORE, the Plaintiff prays that the court order such relief as is just and necessary to make the Plaintiff whole including:

1. Front pay;
2. Damages, including loss of pay and benefits;
3. Statutory liquidated damages due to Defendant's willful conduct;
4. Attorney fees and costs incurred;
5. Any additional relief that is just and equitable.

PLAINTIFF REQUESTS TRIAL BY JURY.

DEBRA SORENSEN,
Plaintiff,

By _____

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